

**EXHIBIT 7**

Mark Carlson  
2/22/2018

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

CRYSTAL LONG,

\*

Plaintiff,

\*

vs.

\* Case No.:

\* 8:17-CV-1955-GJH

PENDRICK CAPITAL

\*

PARTNERS II, LLC, et al.,

\*

Defendants.

\*

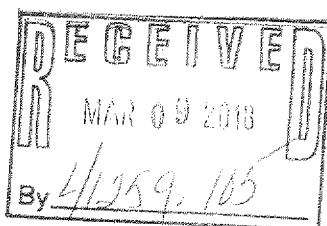
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The deposition of MARK CARLSON took place on Thursday, February 22, 2018, beginning at 10:02 a.m., at the Law Offices of Marshall, Dennehey, Warner, Coleman & Goggin, 50 Glenmaura National Boulevard, Moosic, Pennsylvania, before Christine A. Messner, Court Stenographer and Notary Public in and for the State of Pennsylvania.

\* \* \* \* \*

Reported by:

Christine A. Messner



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2 (Pages 2 to 5)

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:      2 On behalf of the Plaintiff:      3 INGMAR GOLDSON, ESQUIRE      4 The Goldson Law Office      5 1734 Elton Road, Suite 210      6 Silver Spring, Maryland 20903      7 240-780-8829      8 igoldson@goldsonlawoffice.com      9      10 On behalf of the Defendant Ability Recovery Services:      11 RONALD M. METCHO, ESQUIRE      12 Marshall, Dennehey, Warner, Coleman &amp; Goggin      13 2000 Market Street, Suite 2300      14 Philadelphia, Pennsylvania 19103      15 215-575-2595      16 rmmetcho@mdwgc.com      17      18      19      20      21</p>	<p style="text-align: right;">Page 4</p> <p>1 PROCEEDINGS      2      3 STIPULATIONS      4      5 It was agreed by and between counsel that all      6 objections, except as to the form of the question,      7 will be reserved until the time of trial.      8 It was further agreed that the sealing and      9 filing of the deposition transcript will be waived.      10      11 Whereupon --      12 MARK CARLSON was called, and having been      13 duly sworn, was examined and testified as follows:      14      15 EXAMINATION BY MR. GOLDSON:      16 Q. Hi, Mark.      17 A. Good morning.      18 Q. Good morning. Can you just state your      19 name and address for the record?      20 A. Sure. Mark Carlson; 168 York Avenue,      21 Duryea, PA 18642.</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX      2 DEPOSITION OF MARK CARLSON      3 February 22, 2018      4 EXAMINATION BY: PAGE:      5 Mr. Goldson .....4      6 Mr. Metcho .....30      7      8 EXHIBIT: DESCRIPTION: PAGE:      9      10 1 Data Master program information .....18      11 2 Debtor history report .....19      12      13      14      15      16      17      18      19      20      21</p>	<p style="text-align: right;">Page 5</p> <p>1 Q. Thank you. Mark, have you ever been      2 deposed before?      3 A. No.      4 Q. Just a few baseline rules and      5 Mr. Metcho can add to this if you want to.      6 MR. METCHO: Sure.      7 BY MR. GOLDSON:      8 Q. But I'm just going to ask that you      9 allow me to finish my questions and if you start an      10 answer, I'll allow you to finish your answer.      11 A. Perfect.      12 Q. Please respond verbally because our      13 court reporter can't pick up head nods and other body      14 movements. If you don't understand a question,      15 please ask me to clarify rather than, you know, start      16 an answer.      17 A. Okay.      18 Q. -- start answering a question that you      19 don't fully understand.      20 MR. GOLDSON: Okay. Anything      21 else?</p>

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<p style="text-align: right;">Page 6</p> <p>1           MR. METCHO: The only thing I      2         would add -- thank you for the      3         opportunity to do that -- any      4         conversations that you and I have had      5         are protected by the attorney/client      6         privilege. So if Mr. Goldson asks a      7         question regarding something we have      8         discussed in preparation for this      9         deposition for instance, that's     10       protected so you do not have to answer     11       that question. And if that comes up,     12       I'll make sure to notify both opposing     13       counsel and yourself that that may be an     14       issue.</p> <p>15       THE WITNESS: Certainly.</p> <p>16       BY MR. GOLDSON:</p> <p>17       <b>Q. All right. Mr. Carlson, first I would like to go over your educational background. What's the highest level of education you obtained?</b></p> <p>18       A. I completed some college.</p> <p>19       <b>Q. Some college?</b></p>	<p style="text-align: right;">Page 8</p> <p>1       <b>Q. Is your title just supervisor?</b>      2       A. Yes.      3       <b>Q. Okay. When did you become supervisor?</b>      4       A. Monday. February, help me, what is the date, just this week.      5       <b>Q. I would like to congratulate you on that.</b>      6       A. Thank you.      7       MR. METCHO: That would be the      8       21st, right?      9       MR. GOLDSON: No, the 20th.      10       THE WITNESS: 23rd is Friday.      11       BY MR. GOLDSON:      12       <b>Q. Nineteenth?</b>      13       A. Nineteenth, there we go.      14       MR. METCHO: It's been a long      15       week.      16       THE WITNESS: You're right.      17       BY MR. GOLDSON:      18       <b>Q. What were you before a supervisor? What was your position?</b></p>
<p>1       A. Yes.      2       <b>Q. Where did you go to college?</b>      3       A. Lackawanna Area and Harrisburg Area Community College.      4       <b>Q. Okay. What did you study?</b>      5       A. Business management.      6       <b>Q. Business management. And do you currently work at Ability Recovery Services?</b>      7       A. Yes, I do.      8       <b>Q. How long have you worked there?</b>      9       A. I worked since August of 2016, August 2nd to be exact.      10       <b>Q. Okay. Are you on salary?</b>      11       A. No.      12       <b>Q. You get an hourly wage there?</b>      13       A. I do.      14       <b>Q. Okay. What is your hourly wage?</b>      15       A. Currently it is \$12 per hour.      16       <b>Q. What is your position?</b>      17       A. I am now a supervisor at Ability Recovery Services.</p>	<p style="text-align: right;">Page 9</p> <p>1       A. I was a collector.      2       <b>Q. Collector. And when you started in August 2016 were you a collector?</b>      3       A. Yes.      4       <b>Q. So let's go back to when you were a collector because that's more relevant to the complaint at issue here.</b>      5       A. Sure.      6       <b>Q. When you were a collector, did you answer telephones when consumers or when people called ARS --</b>      7       A. Yes.      8       <b>Q. -- Ability Recovery Services?</b>      9       A. Yes.      10       <b>Q. About how many calls would you answer a day?</b>      11       A. Off the top of my head, I would have to assume about 200.      12       <b>Q. That's impressive. Did you make calls as well?</b>      13       A. Yes.</p>

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<p style="text-align: right;">Page 10</p> <p>1       <b>Q. About how many calls would you make a 2 day?</b></p> <p>3       A. My answer would have been collective, 4 so somewhere around the neighborhood of 200 calls 5 collectively, receiving and making.</p> <p>6       <b>Q. Okay. And would you say there's about 7 an equal amount of calls made or?</b></p> <p>8       A. If I were to do the split, probably 9 more outbound calls than inbound calls.</p> <p>10      <b>Q. How do you place the telephone calls? 11 Do you use a telephone or does a computer make the 12 call for you?</b></p> <p>13      A. The computer generates which has the 14 necessary data. There is phone numbers in each field 15 that identifies each specific debtor that allows me 16 to select which phone number to utilize to best 17 possibly get ahold of that individual.</p> <p>18      <b>Q. Okay. Is that the same computer 19 program that you use to pull up an account when 20 somebody calls Ability Recovery Services?</b></p> <p>21      A. Same system.</p>	<p style="text-align: right;">Page 12</p> <p>1       <b>Master will read the telephone number and 2 automatically populate an account?</b></p> <p>3       A. If the account phone number identifies 4 a number in our database, that information will 5 populate.</p> <p>6       <b>Q. Okay. Do you use any other computer 7 programs to access consumer account information?</b></p> <p>8       A. No.</p> <p>9       <b>Q. When a consumer calls and the account 10 is pulled up and on the computer system, whether 11 automatically or whether you pull it up yourself, 12 what information is available to you?</b></p> <p>13      MR. METCHO: I'm going to object 14 to the form of the question, but you can 15 answer it if you are able.</p> <p>16      THE WITNESS: Once again please 17 repeat.</p> <p>18      BY MR. GOLDSON:</p> <p>19      <b>Q. When you pull up an account or when an 20 account is pulled up automatically, what information 21 is available to you about the consumer?</b></p>
<p style="text-align: right;">Page 11</p> <p>1       <b>Q. Same system?</b></p> <p>2       A. Yes, sir.</p> <p>3       <b>Q. What's the name of that computer 4 program?</b></p> <p>5       A. The Debt Master.</p> <p>6       <b>Q. So just to clarify when somebody calls, 7 you pull up their account using the Debt Master 8 computer program?</b></p> <p>9       MR. METCHO: I'm going to object 10 to the form of the question. You can 11 answer if you are able.</p> <p>12      THE WITNESS: Can you repeat the 13 question just for clarity?</p> <p>14      BY MR. GOLDSON:</p> <p>15      <b>Q. Yeah. When a person calls Ability 16 Recovery Services, is it your testimony that you will 17 pull up their account using the Debt Master computer 18 system?</b></p> <p>19      A. That information typically populates on 20 my screen.</p> <p>21      <b>Q. Okay. So when somebody calls, Debt</b></p>	<p style="text-align: right;">Page 13</p> <p>1       A. Their address, their name, phone number 2 utilized. There may be a variety of phone numbers 3 within the system depending on the effectiveness of 4 the skip tracing system that's used. What 5 information is available, well, for some fields may 6 show Social Security numbers, phone numbers, date of 7 births.</p> <p>8       <b>Q. Do you know where that information 9 comes from?</b></p> <p>10      A. No.</p> <p>11      <b>Q. Where Ability gets that information?</b></p> <p>12      A. I am not.</p> <p>13      <b>Q. You just referenced skip tracing, can 14 you explain how Ability skip traces?</b></p> <p>15      A. I have no idea.</p> <p>16      <b>Q. But it's your testimony that some of 17 the information that is populated in that program 18 comes from skip tracing?</b></p> <p>19      A. I've heard that terminology utilized 20 within our field. That information is provided by a 21 client or provided by a service that is used to</p>

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5 (Pages 14 to 17)

<p style="text-align: right;">Page 14</p> <p>1 identify consumer information.</p> <p>2 Q. Do you have -- do you know what that 3 service is?</p> <p>4 A. No.</p> <p>5 Q. Okay. At this time I'm going to play 6 an audio clip.</p> <p>7 A. Sure.</p> <p>8 Q. It's a clip that Ability Recovery 9 Services sent the plaintiff that is purportedly you 10 answering a call from the plaintiff in this case 11 Crystal Long. I'm only going to play it for 12 identification purposes so you can identify whether 13 or not it's you and that's it. So I'll play ten 14 seconds and we'll see if you can identify that is you 15 on the call.</p> <p>16 A. Sure. (Whereupon an audio clip was 17 played to the witness.)</p> <p>18 BY MR. GOLDSON: 19 Q. I saw you nod your head, that is you? 20 A. That is me.</p>	<p style="text-align: right;">Page 16</p> <p>1 it's some other program?</p> <p>2 A. I have no idea.</p> <p>3 Q. So can you start recording?</p> <p>4 A. No.</p> <p>5 Q. Can you stop recording?</p> <p>6 A. No.</p> <p>7 Q. Do you know whether or not Ability 8 Recovery Services has the ability to edit a call 9 after -- edit a recording after a call is completed?</p> <p>10 MR. METCHO: I'm going to object 11 to the form, but you can answer the 12 question.</p> <p>13 THE WITNESS: I've never heard of 14 that.</p> <p>15 BY MR. GOLDSON: 16 Q. So is that a no?</p> <p>17 A. That would be a no, my knowledge, no.</p> <p>18 MR. GOLDSON: Counsel, I have an 19 extra copy of this if you want it.</p> <p>20 MR. METCHO: I would like to see 21 it. Mr. Goldson, this is the</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Thank you. I'm going to get that out 2 of the way so my computer doesn't die here. All 3 right. When you pick up a call, is that call 4 automatically recorded?</p> <p>5 A. By answering that, I make the 6 assumption yes --</p> <p>7 Q. Okay.</p> <p>8 A. -- because I'm never given audio 9 information. But we advise when anybody calls in 10 that the call may be monitored or recorded.</p> <p>11 Q. Okay.</p> <p>12 A. And that's part of a mini Miranda that 13 we utilize.</p> <p>14 Q. Okay. I think you might have partially 15 answered this next question. Do you know how the 16 call is being recorded?</p> <p>17 A. Do I know how?</p> <p>18 Q. Yeah.</p> <p>19 A. In what sense?</p> <p>20 Q. For instance, do you know if it's the 21 Debt Master computer program that's recording or if</p>	<p style="text-align: right;">Page 17</p> <p>1 documentation that was provided in 2 discovery responses that came from 3 Pendrick, correct?</p> <p>4 MR. GOLDSON: Ability actually 5 sent that.</p> <p>6 MR. METCHO: Ability sent it, but 7 it was Pendrick's document that was sent 8 to Ability?</p> <p>9 MR. GOLDSON: I have no --</p> <p>10 MR. METCHO: I recognize the 11 document, that's okay.</p> <p>12 THE WITNESS: Is this for me?</p> <p>13 BY MR. GOLDSON: 14 Q. Yes. Do you recognize that?</p> <p>15 A. In paper format, no.</p> <p>16 Q. Do you recognize it in any other 17 format?</p> <p>18 A. No. I've just never seen this 19 utilized.</p> <p>20 Q. Okay.</p> <p>21 A. No.</p>

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<p style="text-align: right;">Page 18</p> <p>1      <b>Q. Thank you.</b></p> <p>2      MR. GOLDSON: We would like to</p> <p>3      mark that as a multipage exhibit.</p> <p>4      (Whereupon Exhibit 1 was marked</p> <p>5      for identification.)</p> <p>6      BY MR. GOLDSON:</p> <p>7      <b>Q. Mr. Carlson, do you recognize that</b></p> <p>8      <b>document?</b></p> <p>9      A. Paper version of what I would see on</p> <p>10     the screen on my workstation.</p> <p>11     <b>Q. And in the Debt Master program?</b></p> <p>12     A. Yes.</p> <p>13     <b>Q. Okay. Thanks. So earlier when you</b></p> <p>14     <b>testified that you have access to the name, phone</b></p> <p>15     <b>numbers, Social Security numbers; is this what you</b></p> <p>16     <b>see on the program?</b></p> <p>17     A. This is the exact information I would</p> <p>18     have access to seeing.</p> <p>19     <b>Q. Do you make these account activity</b></p> <p>20     <b>comment notes?</b></p> <p>21     A. No.</p>	<p style="text-align: right;">Page 20</p> <p>1      <b>Q. Did you receive any training materials?</b></p> <p>2      A. They are kept in binders at our</p> <p>3      station.</p> <p>4      <b>Q. When was there a training specific to</b></p> <p>5      <b>the Fair Credit Reporting Act that you received at</b></p> <p>6      <b>Ability Recovery Services?</b></p> <p>7      A. We have all received training at</p> <p>8      Ability Recovery Services that identifies each layer</p> <p>9      of your job, what specific role that you have, access</p> <p>10     to the specific documents, fair credit reporting</p> <p>11     practices, what's required for you to adhere to.</p> <p>12     <b>Q. Is it your understanding that Ability</b></p> <p>13     <b>Recovery Services has no choice but to report an</b></p> <p>14     <b>account that it is collecting?</b></p> <p>15     MR. METCHO: I'm going to object</p> <p>16     to the form of the question. I'm also</p> <p>17     going to object to the question on the</p> <p>18     basis of attorney/client privilege, but</p> <p>19     you can answer if you are able.</p> <p>20     THE WITNESS: Okay.</p> <p>21     BY MR. GOLDSON:</p>
<p style="text-align: right;">Page 19</p> <p>1      <b>Q. So none of this data was entered by</b></p> <p>2      <b>you?</b></p> <p>3      A. Allow me to look specifically to</p> <p>4      ensure. No, nothing on here indicates that I typed</p> <p>5      or altered anything in this document.</p> <p>6      <b>Q. Okay. Thank you.</b></p> <p>7      MR. GOLDSON: Mark this as two</p> <p>8      please.</p> <p>9      (Whereupon Exhibit 2 was marked</p> <p>10     for identification.)</p> <p>11     BY MR. GOLDSON:</p> <p>12     <b>Q. So sorry, just give me one second. Are</b></p> <p>13     <b>you familiar with the Fair Credit Reporting Act or</b></p> <p>14     <b>FCRA?</b></p> <p>15     A. For the most part I would imagine, yes.</p> <p>16     <b>Q. How did you become familiar with the</b></p> <p>17     <b>Fair Credit Reporting Act?</b></p> <p>18     A. Through training.</p> <p>19     <b>Q. Through training with your current</b></p> <p>20     <b>employer Ability Recovery Services?</b></p> <p>21     A. Yes.</p>	<p style="text-align: right;">Page 21</p> <p>1      <b>Q. Would you like me to repeat that?</b></p> <p>2      A. Please.</p> <p>3      <b>Q. Is it your understanding that Ability</b></p> <p>4      <b>Recovery Service has no choice but to report the</b></p> <p>5      <b>accounts that it is collecting to credit reporting</b></p> <p>6      <b>agencies?</b></p> <p>7      A. That I don't know.</p> <p>8      <b>Q. Are you saying you don't know whether</b></p> <p>9      <b>or not Ability Recovery Services is required to</b></p> <p>10     <b>report?</b></p> <p>11     A. I don't know what that process entails.</p> <p>12     <b>Q. Do you know when Ability Recovery</b></p> <p>13     <b>Services reports accounts to a credit reporting</b></p> <p>14     <b>agency?</b></p> <p>15     A. I do not.</p> <p>16     <b>Q. Are you familiar with the Fair Debt</b></p> <p>17     <b>Collection Practices Act?</b></p> <p>18     A. I heard the terminology.</p> <p>19     <b>Q. Did you receive any training on the</b></p> <p>20     <b>Fair Debt Collection Practices Act?</b></p> <p>21     A. I imagine I received training for my</p>

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<p style="text-align: right;">Page 22</p> <p>1 role.</p> <p>2     <b>Q. Did you receive any training</b></p> <p>3     <b>materials --</b></p> <p>4         A. I couldn't recall.</p> <p>5     <b>Q. Let me just finish the question for the</b></p> <p>6     <b>record. Did you receive any training materials for</b></p> <p>7     <b>the Fair Debt Practices Collection Act?</b></p> <p>8         A. I couldn't recall.</p> <p>9     <b>Q. Do you know what a trade line is?</b></p> <p>10      A. No.</p> <p>11     <b>Q. What would you call the information</b></p> <p>12     <b>that Ability Recovery Services reports to the credit</b></p> <p>13     <b>reporting agencies?</b></p> <p>14      A. What would I call the information that</p> <p>15     Ability Recovery Services reports to?</p> <p>16     <b>Q. Credit reporting agencies. Credit</b></p> <p>17     <b>reporting agencies are Experian, Equifax, TransUnion,</b></p> <p>18     <b>those are the three major ones.</b></p> <p>19      A. What they report to them?</p> <p>20     <b>Q. Yes.</b></p> <p>21      A. I wouldn't know what the terminology</p>	<p style="text-align: right;">Page 24</p> <p>1     <b>Do you have the ability to determine</b></p> <p>2     <b>for Ability Recovery Services that a caller does not</b></p> <p>3     <b>in fact owe the money that the caller is calling</b></p> <p>4     <b>about?</b></p> <p>5         A. Do I have a way to report that?</p> <p>6     <b>Q. Do you have the ability to determine</b></p> <p>7     <b>for your employer that this caller does not owe the</b></p> <p>8     <b>money?</b></p> <p>9         A. No.</p> <p>10      <b>Q. Okay. If you don't have that ability,</b></p> <p>11      <b>who at Ability Recovery Services does have that</b></p> <p>12      <b>ability to determine that?</b></p> <p>13         A. That I don't know.</p> <p>14      <b>Q. Okay. Do you remember the call with</b></p> <p>15      <b>Crystal Long?</b></p> <p>16         A. I do.</p> <p>17      <b>Q. You do. Do you recall that she called</b></p> <p>18      <b>for two accounts?</b></p> <p>19         A. No, I don't recall.</p> <p>20      <b>Q. Okay.</b></p> <p>21         A. I would be going based on guessed</p>
<p style="text-align: right;">Page 23</p> <p>1 is, no, I wouldn't.</p> <p>2     <b>Q. For the purposes of this deposition I'm</b></p> <p>3     <b>going to call that a trade line.</b></p> <p>4         A. That's what's reported to the credit</p> <p>5     reporting agency, that's what it's referred to it as?</p> <p>6     <b>Q. Yes.</b></p> <p>7         A. Okay.</p> <p>8     <b>Q. As far as you know can Ability Recovery</b></p> <p>9     <b>Services request that a credit reporting agency</b></p> <p>10    <b>delete a trade line?</b></p> <p>11      A. Delete a trade line, how so? I don't</p> <p>12    understand.</p> <p>13      <b>Q. Okay.</b></p> <p>14      A. Delete in what fashion, like?</p> <p>15      <b>Q. Delete, to make disappear.</b></p> <p>16      A. Just to say remove this?</p> <p>17      <b>Q. Yes.</b></p> <p>18      A. Not that I'm aware of.</p> <p>19      <b>Q. Do you have the ability to determine</b></p> <p>20    <b>whether or not Ability Recovery Services -- or I'm</b></p> <p>21    <b>sorry, let me repeat the question.</b></p>	<p style="text-align: right;">Page 25</p> <p>1 memory. I don't think I can specifically. If you</p> <p>2 can help me recall, perhaps that would be something.</p> <p>3     <b>Q. Okay. I'll just show you two</b></p> <p>4     <b>collection letters that Ability Recovery Services</b></p> <p>5     <b>sent to Crystal Long.</b></p> <p>6         A. Okay.</p> <p>7         Q. And these are the accounts that she was</p> <p>8     calling for. Actually let me just, to make it easier</p> <p>9     this is the front of the pages.</p> <p>10      A. Okay.</p> <p>11      <b>Q. So do you recall the plaintiff Crystal</b></p> <p>12     <b>Long calling you about both of these accounts?</b></p> <p>13      A. I recall her calling me about her</p> <p>14    concern on receiving information from us or how I</p> <p>15    believe it is we're on her credit report.</p> <p>16      <b>Q. Okay. For the record, one of these</b></p> <p>17     <b>collection letters from Ability Recovery Services</b></p> <p>18     <b>reflects a balance of \$74 and the other collection</b></p> <p>19     <b>letter shows a balance of \$1,125. So when Crystal</b></p> <p>20     <b>Long called you, were you able to resolve either of</b></p> <p>21     <b>these accounts?</b></p>

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<p style="text-align: right;">Page 26</p> <p>1       A. How so?</p> <p>2       <b>Q. By making the status of the account not</b>  3       <b>collectible or determining she does not owe the</b>  4       <b>money.</b></p> <p>5       A. She called in to dispute the account  6       and it was placed under a dispute.</p> <p>7       <b>Q. Were both accounts placed under a</b>  8       <b>dispute?</b></p> <p>9       A. That I don't recall.</p> <p>10      <b>Q. Do you recall disputing both of these</b>  11      <b>accounts the same way?</b></p> <p>12      A. I don't dispute any accounts any  13      differently.</p> <p>14      <b>Q. Okay.</b></p> <p>15      A. There's only one streamline process of  16      disputing an account.</p> <p>17      <b>Q. Okay. How does that work?</b></p> <p>18      A. If the individual says I dispute the  19      validity of the account, I usually advise them  20      proactively review the credit report and dispute it  21      with the credit reporting agencies. I would label it</p>	<p style="text-align: right;">Page 28</p> <p>1       <b>Q. Okay. Is that a part of your job now</b>  2       <b>as a supervisor?</b></p> <p>3       A. No.</p> <p>4       <b>Q. Have you ever encountered any errors</b>  5       <b>regarding whom an account belongs to?</b></p> <p>6       MR. METCHO: I'm going to object  7       to the form of the question. You can  8       answer if you are able.</p> <p>9       THE WITNESS: How so?</p> <p>10      BY MR. GOLDSON:</p> <p>11      <b>Q. Let me try to.</b></p> <p>12      A. If I may.</p> <p>13      <b>Q. Sure.</b></p> <p>14      A. Someone will call in and say I have a  15      letter for an old tenant, they no longer live here,  16      so we'll mark it as a bad address and simply close it  17      as such, if that would help provide an example.</p> <p>18      <b>Q. Have you ever encountered any errors in</b>  19      <b>the sense that a collection letter was sent to</b>  20      <b>somebody who doesn't actually owe that money?</b></p> <p>21      A. That, I'm not aware of that.</p>
<p style="text-align: right;">Page 27</p> <p>1       as a disputed account that you're contesting the  2       validity of the balance or whatever the specific  3       reason is and just simply notate that within the  4       field and then proactively encourage them to dispute  5       with the bureaus as well.</p> <p>6       <b>Q. Okay.</b></p> <p>7       A. So this information is then sent off to  8       whoever reviews that, I don't know, it's beyond me.</p> <p>9       <b>Q. At Ability Recovery Services, when you</b>  10      <b>say sent off, you mean --</b></p> <p>11      A. I hit enter and once I close the -- I  12      apologize I interrupted you. I close the data, I  13      just send off and it deletes it off of my screen.</p> <p>14      <b>Q. Okay. So with your position as a</b>  15      <b>collector you didn't have the ability to make a</b>  16      <b>determination for Ability Recovery Services that a</b>  17      <b>caller does not owe the money --</b></p> <p>18      A. No.</p> <p>19      <b>Q. -- and therefore she will not be</b>  20      <b>pursued with any more calls or letters?</b></p> <p>21      A. It's not my job.</p>	<p style="text-align: right;">Page 29</p> <p>1       <b>Q. Okay. If a consumer calls and they</b>  2       <b>dispute personal data information, do you have the</b>  3       <b>ability to change the personal data information that</b>  4       <b>Ability Recovery Services has in its system?</b></p> <p>5       A. No.</p> <p>6       <b>Q. Do you know who does have that ability</b>  7       <b>at Ability Recovery Services?</b></p> <p>8       A. I do not.</p> <p>9       <b>Q. Do you recall telling Crystal Long in</b>  10      <b>the phone call that she no longer had to pay the</b>  11      <b>smaller balance of \$74?</b></p> <p>12      A. No longer had to pay, I don't recall  13      that.</p> <p>14      <b>Q. Do you know how Ability Recovery</b>  15      <b>Services' credit reporting process works after you</b>  16      <b>get a dispute call like the one from Crystal Long?</b></p> <p>17      A. No.</p> <p>18      <b>Q. As a collector what is your</b>  19      <b>understanding of your duty under the Fair Credit</b>  20      <b>Reporting Act?</b></p> <p>21      A. In terms of what?</p>

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<p>1           MR. METCHO: I'm going to object      2         to the question in terms of it could      3         potentially seek information that's      4         protected by the attorney/client      5         privilege. But you can answer the      6         question if you are able to.</p> <p>7           THE WITNESS: I'm not sure what      8         you mean.</p> <p>9         BY MR. GOLDSON:</p> <p>10       <b>Q. Okay. Let me rephrase. Earlier you</b>      11       <b>testified that you received Fair Credit Reporting Act</b>      12       <b>training. What did that training entail?</b></p> <p>13       A. That I couldn't recall off the top of      14       my head to be quite honest with you. The Fair Credit      15       Reporting Act as far as the information that -- I'm      16       drawing a blank to be quite honest.</p> <p>17       <b>Q. Okay. That's fine. I have nothing</b>      18       <b>further.</b></p> <p>19</p> <p>20       EXAMINATION BY MR. METCHO:</p> <p>21       <b>Q. I would like to ask you a couple</b></p>	<p>1           A. I advised her to dispute her -- what      2         she received or what she had identified with the      3         credit reporting agencies.</p> <p>4         <b>Q. And as a result of that call, did you</b>      5         <b>take any steps regarding notifying your company</b>      6         <b>Ability that Ms. Long disputed the account?</b></p> <p>7         A. I followed procedure.</p> <p>8         <b>Q. What was the procedure?</b></p> <p>9         A. I labeled the account as a dispute that      10       she had identified that she wasn't agreeing with, you      11       know, what we have in our office and labeled it as      12       such and closed the file.</p> <p>13       <b>Q. Did you place any calls to Ms. Long at</b>      14       <b>any point?</b></p> <p>15       A. No.</p> <p>16       <b>Q. Did you receive any other calls from</b>      17       <b>Ms. Long other than the one that you received in</b>      18       <b>November of 2016?</b></p> <p>19       A. No.</p> <p>20       <b>Q. Did you send any letters to Ms. Long?</b></p> <p>21       A. No.</p>
<p>1         follow-up questions. You testified in November of      2         2016 you were a collector with Ability?</p> <p>3         A. Yes.</p> <p>4         <b>Q. Okay. And you also testified as per</b>      5         <b>the questions of counsel for plaintiff that you did</b>      6         <b>recall having a conversation with the plaintiff in</b>      7         <b>this matter Crystal Long?</b></p> <p>8         A. Yes.</p> <p>9         <b>Q. And did you receive that call or did</b>      10       <b>you place that call?</b></p> <p>11       A. I received that call.</p> <p>12       <b>Q. Okay. And just in a general sense in a</b>      13       <b>summary, what was discussed during that call?</b></p> <p>14       A. She was concerned about information      15       that had appeared on her credit report or letters      16       that she received from us stating that she owed a      17       balance.</p> <p>18       <b>Q. And did you make any recommendations to</b>      19       <b>Ms. Long during that conversation?</b></p> <p>20       A. I did.</p> <p>21       <b>Q. What was your recommendation?</b></p>	<p>1         <b>Q. Are you aware of any other individuals</b>      2         <b>at Ability having any other conversation with</b>      3         <b>Ms. Long?</b></p> <p>4         A. No.</p> <p>5         <b>Q. Are you aware of any other individuals</b>      6         <b>at Ability placing any calls to Ms. Long?</b></p> <p>7         A. No.</p> <p>8         <b>Q. Are you aware of Ms. Long sending any</b>      9         <b>letters to Ability disputing the debt or requesting</b>      10       <b>validation of the debt?</b></p> <p>11       A. No.</p> <p>12       <b>Q. I have nothing further.</b></p> <p>13       MR. GOLDSON: I have nothing      14       further either. Thank you.      15       (Whereupon the deposition was      16       concluded at 10:31 a.m.)</p>
<p>18</p> <p>19</p> <p>20</p> <p>21</p>	<p>18</p> <p>19</p> <p>20</p> <p>21</p>

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<p style="text-align: right;">Page 34</p> <p>1                   <b>CERTIFICATE</b></p> <p>2</p> <p>3                   I, Christine Messner, a Notary Public in and 4                   for Wyoming County, Pennsylvania, do hereby certify 5                   that the deposition was reported in machine 6                   shorthand by me, that the said witness was duly 7                   sworn/affirmed by me, that the transcript was 8                   prepared by me or under my supervision and 9                   constitutes a complete and accurate record of same.</p> <p>10</p> <p>11                  I further certify that I am not an attorney 12                  or counsel of any parties, nor a relative or 13                  employee of any attorney or counsel connected with 14                  the action, nor financially interested in the 15                  action.</p> <p>16</p> <p>17</p> <p>18</p> <p>19                  _____ 20                  Christine Messner</p> <p>21</p>	<p style="text-align: right;">Page 36</p> <p>1                   Dear Sir or Madam:</p> <p>2</p> <p>3                   Bound herewith is the transcript of the 4                   above-referenced deposition. Please read the 5                   transcript and sign the errata pages. Any 6                   additions or corrections should be listed on the 7                   errata sheets provided. Please remove the signed 8                   completed errata sheets, and return them to the 9                   address listed above for processing.</p> <p>10</p> <p>11                  If this process has not been completed 12                  within (30) thirty days from the date of this 13                  letter, we will assume that the right to read the 14                  deposition has been waived. This is in accordance 15                  with Rule 30(e) of the Federal Rules of Civil 16                  Procedure and Rule 2-415 of the Maryland Rules of 17                  Procedure.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>
<p style="text-align: right;">Page 35</p> <p>1                  AL BETZ &amp; ASSOCIATES, INC. 2                  Administrative Offices 3                  P.O. Box 665 4                  Westminster, Maryland 21158 5                  VOICE - (410)752-1733 FAX - (410)875-2857 6                  E-mail- productiondept@albetzreporting.com 7                  www.albetzreporting.com</p> <p>8</p> <p>9                  DATE: March 8, 2018 10                 JOB NUMBER: 180222key_(1)carlson_mark 11                 CASE CAPTION: Crystal Long v. Pendrick Capital 12                 COURT: US District Court, District of Maryland 13                 CASE NUMBER: 8:17-CV-1955-GJH 14                 DEPONENT: Mark Carlson 15                 DATE OF DEPOSITION: February 22, 2018 16                 ATTORNEYS/FIRMS: 17                 Ingmar Goldson, Esq. / The Goldson Law Office 18                 Ronald M. Metcho, Esq. / Marshall Dennehey</p> <p>19</p> <p>20</p> <p>21</p>	<p style="text-align: right;">Page 37</p> <p>1                  READING &amp; SIGNING PROCEDURE</p> <p>2</p> <p>3                  The Deposition of Mark Carlson, taken in 4                  the matter, on the date, and at the time and place 5                  set out on the title page hereof.</p> <p>6                  It was requested that the deposition be 7                  taken by the reporter and that same be reduced to 8                  typewritten form.</p> <p>9                  It was agreed by and between counsel and 10                 the parties that the Deponent will read and sign 11                 the transcript of said deposition.</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p>

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1 DEPOSITION ERRATA SHEET  
2 RE: Al Betz & Associates, Inc.  
3 FILE NO.: 180222key\_(1)carlson\_mark  
4 CASE CAPTION: Crystal Long v. Pendrick Capital  
5 DEPONENT: Mark Carlson  
6 DEPOSITION DATE: February 22, 2018

7 I have read the entire transcript of my  
8 Deposition taken in the captioned matter or the  
9 same has been read to me. I request that the  
10 changes noted on the following errata sheet be  
11 entered upon the record for the reasons indicated.  
12 I have signed my name to the Errata Sheet and  
13 authorize you to attach it to the original  
14 transcript.

15 PAGE/LINE CHANGE REASON

16 \_\_\_\_\_  
17 \_\_\_\_\_  
18 \_\_\_\_\_  
19 \_\_\_\_\_

20 SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

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1 PAGE/LINE CHANGE REASON

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19 \_\_\_\_\_

20 SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

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